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A STUDY OF COMINT PERSONNEL SECURITY STANDARDS AND PRACTICES

A study of personnel security standards and practices in the COMINT field must be approached with certain agreed assumptions. The basic assumption should be that people who handle and have access to this very sensitive material be of such character and soundness of judgment and discretion that they can be entrusted to take all precautions to see that the sensitive material does not fall into the hands of unauthorized individuals or foreign agents. The next assumption must be that people are subject to change and that they may not always continue to meet the desired conditions set out in the basic assumption.

Merely to agree to these assumptions is not enough. Management must agree and be willing to take positive action to accomplish what we call sound personnel security. This positive action will be selection of competent security people and the allocation of funds to carry out programs planned by these professional people.

Taking all this as a necessary preface and on the theory that all security programs in the COMINT family can be improved, it is the purpose of this paper to present:

1. NSA's personnel security procedures and practices.
2. Weaknesses in NSA's program.
3. Inadequacies in USCIB standards and practices.
4. Recommendations.

NSA Declassification/Release Instructions on File.

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1. NSA Personnel Security Procedures and Practices

Personnel security falls into three parts: (a) pre-employment or pre-access screening for selection; (b) background investigation to ascertain whether on the basis of all information on hand the individual meets the criteria for clearance and the actual granting of a final clearance for access; and (c) personnel security supervision to make sure the individuals continue to meet security clearance standards.

Present clearance practices require that civilian employees have a satisfactory personnel interview with the aid of the polygraph and a non-derogatory National Agency Check prior to being granted access to COMINT. If facts warrant, an interim clearance is granted on the foregoing and a final clearance is granted upon completion of a favorable background investigation by one of the three military investigative services or the FBI. There is no uniformity in the scope of these investigations. Each of the investigative agencies handles them according to their own investigative standards. If the personnel interview or a National Agency Check develops information which is not sufficient for termination, but requires further development, the individual is given a further personnel interview to endeavor to clarify the facts or the individual concerned remains in an uncleared status in the Training School until a background investigation is completed.

Military personnel assigned to duty report with a certificate of interim or final TOP SECRET cryptographic clearance. They submit a Statement of Personal History which is screened, and, if there are no obvious bars to indoctrination after review, the individual reports for indoctrination. Investigations on civilian personnel are reopened each four years

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in keeping with USCIB policy of completion within five years. USCIB Directive No. 5 requires as a minimum a National Agency Check and a review of an up-to-date Personal History Statement. In NSA we request such additional investigation deemed necessary after a complete review of the individual file.

Personnel security supervision is handled in two parts, one of which is security education.

NSA's security education program is designed to incorporate three phases. The first involves the intensive security education of new employees from the time of their entrance on duty with the Agency, through their training period at the NSA School until they leave for their job assignment. The second phase involves a continuing security education program for NSA employees within the Washington area installations. The third phase involves assistance to the NSA Field Activities and service cryptologic agencies in setting up and administering effective security education programs.

The whole program anticipates close and continuous contact with all employees through the use of indoctrinations; periodic lectures, including panel forum discussions; special purpose briefings and debriefings; posters; security publications; and other visual aids.

Perhaps the more vital part of the security supervision program is that which has each of the Agency's cleared employees under a degree of scrutiny. It is intended to expose those security risks who: (a) have succeeded in filtering through our initial screening procedures, including a "complete" background investigation; (b) have undergone a change of loyalty, in other words, have defected; (c) since the initial clearance,

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have engaged in misconduct which if known would disqualify an applicant for clearance, or (d) were deliberately "planted" in our midst as a result of long range infiltration plans.

There are three basic programs within this operation. They are liaison, investigation and research.

The liaison and investigative activities are designed primarily to serve as a means of collection of information concerning NSA employees. This collection is augmented through response to the security programs initiated in security education. Through contacts with the local police or other local and Federal law enforcement and security agencies, significant information is received concerning NSA employees which, if not solicited, may never come to the attention of the Security Officer. In investigative operations, considerable information is collected through interview, interrogation and records review. Data is supplied to the research section by the liaison and investigative activities, where it is reviewed and analyzed. Here patterns of infiltration, weaknesses in the Security Program or other matters requiring further investigation may be brought to light. Any questions or undeveloped leads may be referred for further development to investigators as they arise.

The research operation is accomplished by comparing and analyzing the familiar essential elements of information. A work sheet or data card is used which reflects a brief summary of an individual's background; motivation for employment with NSA; identity of those who recommended the individual for such employment and their affiliation with NSA, if any; the manner in which the individual learned of such employment; the identity of his references, associates, close friends or room-mates. It is desirable

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to know how the individual spends his spare time, his attendance record, his transfers and/or promotions, and the degree and scope of access to classified information.

It is obvious that it is not practical to accumulate such information on all NSA employees, although it may be desirable; therefore, a system of selecting targets or candidates must be established. It is a tentative plan, limited by facilities and personnel, to schedule first those individuals employed by NSA, who came in the days of more lenient security controls and against whom there are unresolved allegations of disloyalty or pro-communist associations. Also, there is the individual against whom information has been developed since his initial employment. Other criteria used in the selection of research targets may simply be by reason of assignment to a particular branch, section or unit which is brought under scrutiny due to a pattern of questionable incidents. As an example, if a series of unexplained malfunctions of vital equipment were to occur, in a particularly sensitive unit, each person assigned to that unit would bear "research."

NSA follows a policy of compartmentation and the principle of "need to know" is adhered to. A system of RESTRICTED, SECURE and EXCLUSION areas is used. It must be recognized, however, that even with these principles there still will be many persons who, because of operational necessity, will be in a position because of the information they possess to do great harm if they "go wrong."

While, within the limits of practical operation, these principles should continue to be followed, keeping the employee secure is by far the surest way of keeping the information secure.

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2. Weaknesses in NSA's Program

It has been found from experience that a personnel interview with the aid of the polygraph produces information bearing on clearance which is not produced by the background investigation.

Military personnel assigned to NSA do not receive a personnel interview. Experience in cases of persons converting from military status and former employees applying for reemployment has shown that it would be extremely valuable to interview all persons assigned to NSA and to reinterview employees at regular intervals. It is realized that before this is attempted the proper climate must be established. Employees must be educated and shown that this is not a witch-hunting operation but an honest attempt to remove those who, by no longer meeting the clearance standards, endanger the security of very essential work.

As it is necessary in the field of security determination to utilize all possible sources of information on which an initial or continued clearance is based, it is difficult to justify not using all available personnel interview techniques.

Because of shortage of personnel, it has not been possible to completely phase out our security education program or our research program. Both have been started and have functioned in part. Our investigative and liaison functions have not entirely followed the pace that is necessary to secure all the available information on our personnel. Again, lack of personnel, making it necessary to shift employees to prevent backlog, has prevented us from completely putting these programs into effect.

In the area of compartmentation, it is felt that only by physical separation by buildings could compartmentation be made more effective. The nature

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of the work of certain employees does not require any access to COMINT but, because of their physical presence in areas adjacent to COMINT activities, they are exposed to a certain amount of it. This is an administrative problem which concerns itself with budgetary limitations as to space, and personnel and operational necessity.

3. Inadequacy of Present USCIB Standards and Practices

The weaknesses present insofar as USCIB clearance standards and practices are concerned are set forth as follows:

- a. USCIB does not require neighborhood investigations.
- b. USCIB policy forbids accessibility to people with certain background information; yet, there are no provisions for removing an individual from a job. No clean cut mechanism can be determined through which enforcement can be made on charges that are insufficient to constitute a case under Executive Order 10450. USCIB Directive No. 5 can be applied to applicants for employment and to all employees within the first year of employment. In the case of veterans, it may be impossible to enforce. However, in the case of employees of long standing, it can be applied to non-veterans only by stretching the "letter" of the applicable regulation.
- c. The meaning of "excellent character and discretion" is being subjected to many interpretations. In NSA, "excellent character and discretion" is being applied fully within the connotation of its phraseology.
- d. In the present directive, paragraphs 3a(2), 3a(3) and 3a(4) should be more specific in defining "members of his immediate family" and "person to whom he may reasonably be supposed to be bound by ties of affection, kinship, or obligation." In NSA "members of immediate family" have been

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defined as subject's spouse, his offspring, parents, brothers, sisters and his spouse's parents, brothers, sisters, and spouse's offspring, and anyone residing in his household as a member of the family. In making particular reference to paragraph 3a(3) and 3a(4), the same persons are included as "immediate family" along with the subject individual's uncles, aunts, grandparents and first cousins. Paragraph 3a(4) should include a citizen as well as a resident of a foreign country having national interests opposed to those of the United States.

e. There is no uniformity in the scope of investigations conducted by the three services, either initially or in the reinvestigations.

f. USCIB Directive 5 has no provision for personnel security supervision or a periodic personnel interview preferably with the aid of the polygraph. The utilization of personnel interview techniques preferably along with the polygraph indicates that its use in screening personnel is necessary for determining the security reliability of personnel having access to COMINT.

g. Under present procedures there is effective control of military personnel to dangerous or unacceptable areas; however, the control of civilians leaving the employment of the COMINT activities is non-existent. There have been instances where individuals indicated during debriefing interviews that they contemplated traveling or accepting employment in dangerous or unacceptable areas. In such instances they were advised that they should not undertake such employment or travel, and the State Department was apprised of the situation so they would be denied passports.

4. Recommendations

There are several factors which may be considered as contributing to the breakdown of a fully effective personnel security program. These are (a) budgetary limitations; (b) lack of qualified personnel to execute

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security functions and responsibilities; (c) inconsistency in the interpretation and definition of terms and the application of facts to standards within the cryptologic family; and (d) lack of programs. With this in mind, the following recommendations are made:

1. If the cryptologic services feel that the polygraph cannot be utilized, their personnel having access to COMINT should have at least a favorable background investigation before being granted such access.
2. There should be a strict adherence to the reinvestigation requirement of USCIB. It should include (a) National Agency Check; (b) local law enforcement agency check; (c) local credit check; (d) neighborhood investigation; and (e) references, supervisors and fellow employees. Many times these additional investigative steps would reflect excessive drinking, allegations of immoral acts and other items pertinent to clearance standards. More frequent reinvestigations would not appear to be feasible than the present policy of every four years, because the supporting investigative services are not in the position to take on any additional cases for investigation.
3. There should be a broader coverage in background investigations to include neighborhood investigations, credit check, and interview of more than two developed references in new investigations.
4. A vigorous coordinated personnel security supervision program should be in effect to include a security education program.
5. An intensive personnel interview should be made of all personnel having access to COMINT, either civilian or military, and this would be desirable with the aid of the polygraph.

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6. As a means for further improving standards and practices, the establishment in the cryptologic services of spaces in their Tables of Organization for (a) professional security officers, and (b) trained assistant security officers. These trained security people, either military or civilian, could be assigned as necessary to the various Headquarters, Security Groups, and other segments of the cryptologic services.

7. Investigative agencies who are requested to handle the background investigations regarding cryptologic personnel should be given an educational lecture regarding the sensitivity of the business so they will be aware of what is pertinent to look for in an investigation.

8. Any complaint type investigation involving military personnel assigned to NSA should be made in coordination with the Security Division, NSA. This would permit a continuous exchange of information for evaluation.

9. The Security Office of the cognizant agency should be consulted in every case where an individual having access to COMINT is to travel officially or unofficially outside the continental limits of the United States. This is to prevent several problems: (a) people who are too knowledgeable from going to certain places; (b) to give the Security Office an opportunity to give the individual a security briefing; and (c) to prevent certain individuals who are under current investigation from traveling outside the United States.

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